

Court File No.:

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

AUTOMOTIVE PARTS MANUFACTURERS' ASSOCIATION

**Plaintiff/
Moving Party**

- and -

**JIM BOAK, JOANNE CALLAWAY, HILDA FISCHER,
LORI INVERARITY, LEO LUCIO, GIL PONTE, MANBAE SINGH-GALL
DARLENE THOMPSON and JOHN DOE**

**Defendants/
Responding Parties**

AFFIDAVIT OF JASON BELLAIRE

I, Jason Bellaire, of the Town of LaSalle, County of Essex, Province of Ontario MAKE
OATH AND SWEAR AS FOLLOWS:

1. I am a member of the Windsor Police Service and hold the rank of Deputy Chief of Police.
2. From Monday February 7, 2022 through to Thursday February 10, 2022, I have attended, as part of my official police duties, a public demonstration at the intersection of College Avenue and Huron Church Road in the City of Windsor (the "Location").

3. The Location forms the primary entrance and exit from the Ambassador Bridge International Crossing from Windsor, Ontario, Canada to Detroit, Michigan, U.S.A (the **"Bridge"**).
4. I have attended the Location and have viewed the Location remotely by live video footage on multiple occasions during the aforesaid dates, I have observed numerous unknown and unnamed persons (the "Protesters") and stationary vehicles occupy and block the primary entrance and exit from the Bridge. The Protesters and vehicles parked on the roadways have effectively formed a blockade of the primary entrance and exit of the Bridge.
5. The blockade resulted in the complete closure of all Canada-bound vehicular traffic from the Bridge and severely limited US-bound vehicular traffic on the Bridge to only the secondary Bridge entrance located on Wyandotte Street West in Windsor.
6. Sometime during the evening hours of February 9, 2022 or the early morning hours of February 10, 2022, unnamed persons and vehicles intermittently blocked the secondary Bridge entrance on Wyandotte Street (the **"Secondary Location"**), in Windsor, Ontario.
7. As of the time of swearing this Affidavit, all access and exit to and from the Bridge has been obstructed by the Protestors.
8. I, and other Windsor Police Service officers, have attended the Location and the Secondary Location on multiple times from February 7, 2022 through to February 10, 2022 and have

asked the Protesters blockading the Bridge entrances and exit to disperse to end the blockade of the highway and access to the Bridge.

9. Windsor Police Service efforts to have the Protesters actively blockading the Bridge disperse have been unsuccessful and the blockade continues as of the time of my swearing of this Affidavit.

10. The Protesters at the Location and the Secondary Location are blocking a highway, namely the intersection of College Avenue and Huron Church Road, and Wyandotte Street West immediately adjacent to the Bridge, and are thereby causing a disturbance by impeding members of the public and vehicular traffic to and from the Bridge.

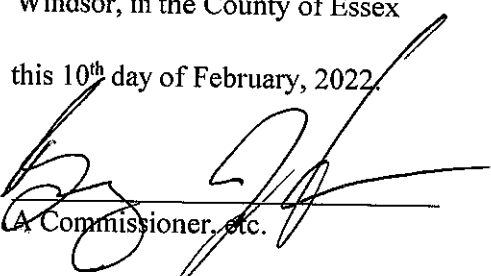
11. It is my belief that the actions of the Protesters are contrary to provisions of Criminal Code of Canada sections 175(1), 180(2), 430(1)(c)(d), and 423(1)(g).

12. I swear this Affidavit in support of a motion for an injunction and for no other or improper purpose.

SWORN BEFORE ME at the City of

Windsor, in the County of Essex

this 10th day of February, 2022.


A Commissioner, etc.

Bryan Jason Lockyer, a Commissioner, etc.,
Province of Ontario, for McTague Law Firm LLP,
Barristers and Solicitors.
Expires August 15, 2023.

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